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Hearing Date: February 4, 2010
Hearing Time: 10:00 a.m.

Attorneys for Defendants
Emily Chasalow, Mark Chais, Wrenn Chais,
William Chais, Miri Chais and the Entities
Identified on Exhibit 1 hereto

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	SIPA LIQUIDATION
BERNARD L. MADOFF INVESTMENT SECURITIES LLC,	No. 08-01789(BRL)
Debtor.	Adv. Pro. No. 09-1172 (BRL)
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,	WITHDRAWAL OF DEFENDANTS' LIMITED OBJECTIONS TO THE TRUSTEE'S MOTION FOR ENTRY OF A PROTECTIVE ORDER
Plaintiff,	
v.	
STANLEY CHAIS, <i>et al.</i> ,	
Defendants.	

**WITHDRAWAL OF DEFENDANTS' LIMITED OBJECTIONS TO THE TRUSTEE'S
MOTION FOR ENTRY OF A PROTECTIVE ORDER**

Defendants Emily Chasalow, Mark Chais, Wrenn Chais, William Chais, and the Entities
Identified on Exhibit 1 hereto (collectively, "Defendants")¹ hereby withdraw their Limited
Objections to the Trustee's Motion for Entry of a Protective Order dated December 18, 2009.

¹ The withdrawal of the Limited Objection does not constitute an appearance for defendant Miri Chais. Miri Chais expressly does not consent to jurisdiction in the United States and is not waiving her position that this Court does not have jurisdiction over her.

Respectfully submitted,

SILLS CUMMIS & GROSS P.C.

Dated: February 2, 2010

/s/ Andrew H. Sherman

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*Emily Chasalow, Mark Chais, Wrenn Chais,
William Chais, Miri Chais and the Entities
identified On Exhibit 1 hereto*

EXHIBIT 1

Unicycle Trading Company
Unicycle Corporation
Emily Chais Trust No. 2
Emily Chais Trust No. 3
Emily Chais 1983 Trust
Emily Chais Issue Trust No. 1
Emily Chais Issue Trust No. II
Benjamin Paul Chasalow Transferee Trust No.1
Benjamin Paul Chasalow 1999 Trust
Rachel Allison Chasalow Transferee Trust No. 1
Rachel Allison Chasalow 1999 Trust
Justin Robert Chasalow Transferee Trust No. 1
Justin Robert Chasalow 1999 Trust
Onondaga, Inc. Pension Plan
William Frederick Chais Trust No. 2
William Frederick Chais Trust No. 3
William Frederick Chais 1983 Trust
William Frederick Chais Issue Trust No. I
William Frederick Chais Issue Trust No. II
Madeline Chais Transferee Trust No.I
Madeline Celia Chais 1992 Trust
Chloe Frances Chais Transferee Trust No. I
Chloe Frances Chais 1994 Trust
Jonathan Chais Transferee Trust No. I
Jonathan Wolf Chais 1996 Trust
Mark Hugh Chais Trust No. 2
Mark Hugh Chais Trust No. 3
Mark Hugh Chais 1983 Trust
Mark Hugh Chais Issue Trust No. I
Mark Hugh Chais Issue Trust No. II
Tali Chais Transferee Trust No. I
Tali Chais 1997 Trust
Ari Chais Transferee Trust No. I
Ari Chais 1999 Trust
1994 Trust for the Children of Stanley and Pamela Chais
1996 Trust for the Children of Stanley and Pamela Chais
William & Wrenn Chais 1994 Family Trust
1999 Trust for the Grandchildren of Stanley and Pamela Chais
Chais Investments, Ltd.
Onondaga, Inc.
Chais Management, Ltd.,
Chais Management, Inc.
Chais Venture Holdings